



Supply Chain Policy

Tin Technology & Refining LLC's (Tin Tech) Supply Chain policy is driven by a commitment to completely exclude all Conflict Minerals and Metals from its supply chain.

Conflict Minerals and Metals are materials, which through their mining, production or supply directly or indirectly finance or benefit armed groups, and/or direct or indirect support to public or private security forces, and/or bribery, money laundering, and fraudulent misrepresentation of the origin of materials, and/or involve other serious human right abuses in high-risk and conflict-affected regions (CAHRAs).

Human rights abuses include:

- Any forms of torture, cruel, inhuman and degrading treatment.
- Any forms of forced or compulsory labor.
- The worst forms of child labor.
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Other gross human rights violations and abuses such as widespread sexual violence.

Through this policy, all such materials are excluded from Tin Tech's supply chain and therefore any metal produced and sold by Tin Tech can be categorized as conflict free.

In particular, Tin Tech's policy to maintain conflict free status in the management of its supply chain is as follows:

1. The policy is to purchase materials only from reputable suppliers with whom long relationships have been established or on whom adequate due diligence in terms of 'know your counterparty' protocols can be carried out. Supplies may be primary or secondary tin; Tin Technology does not source any tin concentrates.
2. Tin Technology supports the goal of ending violence, human rights violations and environmental devastation. In all cases due diligence will be conducted on the supplier and supply chain to ensure that the supply is genuine, legitimate and does not in any way contribute to conflict or human rights abuses. Tin Tech will immediately suspend or discontinue engagement with counterparties where we identify a reasonable risk that they are sourcing from, or are linked to, any party committing serious human rights abuses, support armed groups, support public or private security forces, or fraudulent or corrupt handling of materials.
3. Tin Tech complies at all times with both national and international law relating to Conflict Minerals, including UN Security Council Resolutions and the US Dodd Frank Act.
4. Tin Tech recognizes that financial transparency is critical to preventing corruption and ensuring that mineral wealth benefits local communities. We formally support the principles of the Extractive Industries Transparency Initiative (EITI) and advocate for its implementation in all countries where we source minerals.
5. The supply chain policy fully conforms to the third edition of the OECD Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the Responsible Minerals Initiative Assurance Process (RMAP) Tin and Tantalum Standard.

6. Tin Tech incorporates third party audits into the supply chain as part of maintaining its status as a Responsible Minerals Assurance Process Conformant Smelter under RMI.
7. Tin Tech personnel visits all primary tin supplier sites on a regular basis to ensure compliance with this policy.
8. Tin Tech has a risk management strategy as defined by the OECD Guidance and tracks the performance of risk mitigation. This strategy includes suspending or discontinuing supplies in the event that unacceptable practices are identified.

Tin Tech's policy is to differentiate itself by offering its customers and trading partners conflict free metals and products, so that the final customer in the supply chain can be confident its products are produced from metals which are conflict free.

Ara Aposhian – General Manager

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